West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Draft/Proposed Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-06100134-2013**
Application Received: **April 30, 2012**
Plant Identification Number: **061-00134**
Permittee: **Longview Power, LLC**
Facility Name: **Longview Power Plant**
Mailing Address: **966 Crafts Run Road, Maidsville, WV 26541**

Revised: NA

Physical Location:	Maidsville, Monongalia County, West Virginia
UTM Coordinates:	589.2 km Easting • 4395.7 km Northing • Zone 17
Directions:	From Morgantown, take WV Route 19 West to Route 100 North to Route 53 (Fort Martin Road). Proceed 5.4 miles. Turn left into Gate 2. Proceed to security.

Facility Description

Longview is an electric generating unit with a 6,114 MMBtu/hr pulverized coal fired boiler steam turbine generator and a natural gas fired auxiliary boiler, with associated equipment including coal, limestone, and ash handling, a cooling tower, an emergency generator, and a fire pump.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	2953	679
Nitrogen Oxides (NO_X)	1791	340
Particulate Matter ($PM_{2.5}$)	258	11
Particulate Matter (PM_{10})	521	22
Total Particulate Matter (TSP)	537	22
Sulfur Dioxide (SO_2)	2420	364
Volatile Organic Compounds (VOC)	99	16

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Total Miscellaneous HAPs	15.88	2.87

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 2,953 tons per year of CO, 2,420 tons per year of SO_2, 1,791 tons per year of NO_x, and 521 tons per year of PM_{10}. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Longview Power Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Control Of Air Pollution From Combustion Of Refuse
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers.
45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR14	Permits For Construction And Major Modification Of Major Stationary Sources Of Air Pollution For The Prevention Of Significant Deterioration

45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
45CSR20	Good Engineering Practice As Applicable To Stack Heights
45CSR30	Requirements For Operating Permits
45CSR33	Acid Rain Provisions And Permits
45CSR34	Emission Standards For Hazardous Air Pollutants
45CSR39	Control Of Annual Nitrogen Oxides Emissions
45CSR40	Control Of Ozone Season Nitrogen Oxides Emissions
45CSR41	Control Of Annual Sulfur Dioxide Emissions
40 C.F.R. 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units
40 C.F.R. 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. 60, Subpart Y	Standards of Performance for Coal Preparation Plants
40 C.F.R. 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 72	Permits Regulation
40 C.F.R. Part 73	Sulfur Dioxide Allowance System
40 C.F.R. Part 74	Sulfur Dioxide Opt-ins
40 C.F.R. Part 75	Continuous Emissions Monitoring
40 C.F.R. Part 76	Acid Rain Nitrogen Oxides Emission Reduction Program
40 C.F.R. Part 77	Excess Emissions
40 C.F.R. Part 78	Appeals Procedure (for Acid Rain Program)
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
State Only:	
45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R14-0024E	July 20, 2012	
R33-56671-2013-1	December 31, 2008	Effective January 1, 2009

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

1. **45CSR2 -** ***To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.***

   - The Opacity limit for each stack is 10% based on a six minute block average.

     - The Longview Plant main stack (EA-1) will primarily use a PM Continuous Emissions Monitor (CEM) which is installed and operated in accordance with Performance Specification (PS) 11 in Appendix B of 40CFR60 as required by Permit R14-0024E. If any 24-hour block average PM rate based on PM CEM data indicates an excursion of the hourly PM limit or data systems other than PM CEM data are used to satisfy the 75 percent of total operating hours per 30 day rolling average of the hourly PM limit, then visible emission observations in accordance with Method 9 of appendix A-4 of 40CFR Part 60 shall be conducted.

       45CSR§2-8.2.a.2. requires fuel burning units to submit a monitoring plan for compliance with the visible emissions standards of 45CSR§2-3 within six (6) months of the effective date (August 31, 2000) of the rule. The intent was that the existing fuel burning units, at the time of the effective date of the rule, submit such monitoring plans if required and that any new fuel burning units would have the monitoring incorporated into an NSR construction permit. There are no deadlines or provisions in this rule for the submittal of a monitoring plan for newly constructed fuel burning units. Longview falls in this latter scenario in which the monitoring is incorporated in permit R14-0024. Therefore, Longview was not required to submit a Rule 2 monitoring plan.

     - The auxiliary boiler is infrequently used and is fired on natural gas only. Therefore pursuant to 45CSR§2-8.4.b. and 45CSR§2A-3.1.a., the auxiliary boiler is exempt from the Rule 2 opacity monitoring and testing requirements.

   - The rated design heat input (DHI) for the fuel burning unit (SB-1) at the Longview Plant is 6114 mmBtu/hr. The rated design heat input (DHI) for the "auxiliary boiler" at the Longview Plant is 225 mmBtu/hr. Using the calculation procedure (.05 x TDHI) outlined in Section 4.1.a. of 45CSR2 for the main boiler, the allowable PM emission limit is established as (.05 x 6114) which equals 305.7 lb/hr through stack "EA-1". The PM limit established in 40 CFR 60 Subpart Da and Permit R14-0024E is more stringent (i.e., 0.015 lb/MMBtu) and therefore compliance with the streamlined Subpart Da/R14-0024E permit limit will ensure compliance with the Rule 2 limit. Using the calculation procedure (.09 x TDHI) outlined in Section 4.1.b. of 45CSR2 for the auxiliary boiler, the allowable PM emission limit is established as (.09 x 225) which equals 20.25 lb/hr through stack "EX-1". The PM limit established in Permit R14-0024E is more stringent (i.e.,

1.26 lb/hr) and therefore compliance with the streamlined Permit R14-0024E limit will ensure compliance with the Rule 2 limit.

- 45CSR2A requires periodic PM testing in which the frequency of testing can be every one, two or three years based upon the results of the previous test. The once every three years testing frequency would apply if the previous test results were less than or equal to 50% of the Rule 2 weight rate standard. Since Longview's R14-0024E Permit limit is less than 50% of the Rule 2 Standard, the testing frequency would be once every three years. Also, the potential PM emissions are equal to the potential PM_{10} emissions and testing is required once every 12-months for PM_{10}.(see condition 5.3.4.) Furthermore, a PM CEM which establishes compliance is required to be operated on a continual basis. Therefore, the Testing frequency of Rule 2A is not included in the permit.

- The auxiliary boiler is infrequently used and is fueled by natural gas and therefore exempt from the Rule 2 testing requirements pursuant to 45CSR§2A-3.1.a.

2. 45CSR10 - *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides*.

➢ Under this rule, Longview's main boiler *SB-1* is defined as a "Type a" fuel burning unit (FBU). This rule however, is tailored to existing "Type a" FBUs and does not have provisions for any other "Type a" FBUs. Therefore Longview's main boiler is not subject to Rule 10.

➢ Longview's auxiliary boiler *SX-1* is defined as a "Type b" FBU. The allowable SO_2 emission limit for the auxiliary boiler discharging though "EX-1" is established in 45CSR§10-3.3.f. as the product of 3.2 and the total design heat input. The rated design heat input (DHI) for the auxiliary boiler is 225 mmBtu/hr. Using the calculation procedure (3.2 x TDHI) as outlined in Section 3.3.f. of 45CSR10, the allowable SO_2 emission limit for the auxiliary boiler discharging through stack "EX-1" is established as (3.2 x 225) which equals 720 lb/hr. The SO_2 limit established in Permit R14-0024E is more stringent (i.e., 0.133 lb/hr) and therefore compliance with the streamlined Permit R14-0024E limit will ensure compliance with the Rule 10 limit.

- Longview's auxiliary boiler is infrequently used and combusts only natural gas. Because it combusts natural gas, under 45CSR§10-10.3., it is exempt from the Testing, Monitoring, Recordkeeping, and Reporting requirements of 45CSR§10-8.

3. 45CSR13 - *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation*

➢ The Longview Plant is subject to Rule 13 for all regulated air pollutants that are not covered specifically by Rule 14 including the 45CSR13 public notice procedures and some HAPs. Any such requirements have been incorporated into Permit R14-0024E as appropriate.

4. *45CSR14 - Permits For Construction And Major Modification Of Major Stationary Sources Of Air Pollution For The Prevention Of Significant Deterioration*

➢ Permit R14-0024E a Prevention of Significant Deterioration (PSD) permit which contains applicable requirements and incorporates Best Available Control Technology (BACT). The permit covers the entire facility including the PC Boiler (main boiler) and cooling tower, the auxiliary boiler, the coal handling system, the limestone handling system, the ash handling system, the emergency generator and the emergency fire pump. Included in the permit are 40 CFR Part 60 applicable requirements from Subparts Da, Db, Y and OOO, 40 CFR Part 63 requirements from Subpart UUUUU as well as requirements from State Rules 45CSR2 and 45CSR10.

- The initial testing requirements in R14-0024E have been fulfilled. Therefore, the language in in sections 4.3.1., 5.3.1., 5.3.4., 5.3.5 and 5.3.6. has been modified as required for ongoing testing. Sections 5.2.2., 5.3.2., 6.3.1., 6.3.2. and 7.3.1. have not been included in the Title V permit since the testing has been fulfilled.

Section 3 – Facility Wide Requirements

- Condition 3.1.12. – This condition is a result of a state driven mitigation plan and is an agreement between the federal land manager and the WVDEP and Longview Power LLC. There are no underling rules or regulations requiring this condition. Therefore it is considered to be State-Enforceable only and has been designated as such in the Title V permit.

- Condition 3.1.12.f. – the reference in condition 3.1.7.f. to "Paragraphs A.20.a through A.20.e herein" is a typographical error which was carried over from an earlier version of R14-0024 prior to the permit format change. It should have read "Paragraph 3.1.7.a through 3.1.7.e herein." Since the corresponding Title V permit condition is 3.1.12.f. it reads "Paragraph 3.1.12.a through 3.1.12.e herein" in the Title V permit.

Section 4 - Coal Handling Equipment

- This section contains limits for throughputs, opacity, and PM emissions. The coal handling equipment is subject to 40 CFR 60 Subpart Y.

    - With the exception of the stacking belt conveyor and the storage pile, all equipment is fully enclosed. Compliance is demonstrated through periodic visible emission checks, monitoring and record keeping of coal delivered to the facility and if required, testing and the operation and maintenance of control equipment.

- Condition 4.5.1. - language was revised in order to delete the website reference.

Section 5 - PC Boiler and Cooling Tower

- This section contains requirements and limits for heat input, opacity, PM, PM_{10}, SO_2, NO_x, CO, VOC, H_2SO_4, Hg, HCL and HF. The PC Boiler is subject to 40 CFR 60 Subpart Da and 40 CFR 63 Subpart UUUUU. The compliance date for Subpart UUUUU is April 16, 2015. However, this date does not apply to the requirements in conditions 5.1.9., 5.1.10. and 5.1.11. since they are requirements of permit R14-0024E.

    - Compliance is demonstrated with the use of a continuous emissions monitoring system (CEMS), to measure and record the emissions of PM, SO_2, NO_x, CO, Hg and other parameters from the PC Boiler stack, periodic testing, and coal sampling and analysis.

- In Section 5 of R14-0024E a typographical error occurs in which the PC boiler stack is identified as emission point "EB1" instead of "EA1." Also the Title V application shows the PC boiler stack as emission point "EA-1." Therefore in the Title V permit "EB1" has been replaced with "EA-1."

- Condition 5.1.7. - This condition requires that the permittee establish through testing, the relationship between CO emissions and VOC emissions. Longview has found that the test data collected to date (2011 and 2012 testing) do not demonstrate a direct, technically valid correlation between CO and VOC emissions that would be appropriate for use as a compliance indicator as specified by the permit. Nevertheless, all 2011 and 2012 stack test

results demonstrate that Longview consistently meets VOC emission limits. Continued sound operation and maintenance of Longview's PC Boiler can be considered a valid parametric demonstration of continued compliance with the VOC limit. While the CO CEMS does not provide a direct surrogate measure for VOC emissions, the CO CEMS can be used to demonstrate ongoing operation of the PC Boiler, which in turn has been demonstrated in 2011 and 2012 to produce compliant VOC emissions.

- Condition 5.1.8. - This condition requires that the permittee establish through testing, the relationship between SO_2 emissions and H_2SO_4 emissions. Longview has found that the test data collected to date (2011 and 2012 testing) do not demonstrate a direct, technically valid correlation between SO_2 and H_2SO_4 emissions that would be appropriate for use as a compliance indicator as specified by the permit. Nevertheless, all 2011 and 2012 stack test results demonstrate that Longview consistently meets H_2SO_4 emission limits. Continued sound operation and maintenance of Longview's Air Quality Control System (AQCS) can be considered a valid parametric demonstration of continued compliance with the H_2SO_4 limit. While the SO_2 CEMS does not provide a direct surrogate measure for H_2SO_4 emissions, the SO_2 CEMS can be used to demonstrate ongoing operation of the AQCS, which in turn has been demonstrated in 2011 and 2012 to produce compliant H_2SO_4 emissions.

- Condition 5.1.14. – This condition has been fulfilled during construction and therefore not included in the Title V permit.

- Condition 5.2.1. – the PC Boiler is not subject to the Rule 2 monitoring plan therefore, the"45CSR§2-8.2.a," and "45CSR§2A-6.3." citations of authority in the R14 permit were not carried over to the Title V permit.

- Condition 5.2.6. – the reference to condition 5.1.16. in the R14 permit should have been 5.1.15. Therefore it has been corrected in the Title V permit.

- Condition 5.2.7. – the reference to condition 5.1.14 in the R14 permit should have been 5.1.13. Therefore it has been corrected in the Title V permit.

- Conditions 5.3.3., and 5.3.4. – the citation of authority for these two conditions both refer to R14-0024 §5.3.3. A typographical error is contained in the R14 permit in which 5.3.3. was used twice in the permit requirements.

- Condition 5.4.4. – a typographical error was corrected by adding the word "day" at the end of the first sentence.

- Condition 5.5.1. - language was revised in order to delete the website reference.

- Condition 5.5.2. – a typographical error was corrected by removing the word "of" near the beginning of the first sentence.

<u>Section 6 - Auxiliary Boiler</u>

- This section contains requirements and limits for hourly heat input, hours of operation, amount of natural gas consumed, opacity, PM, PM_{10}, SO_2, NO_x, CO, VOC and the sulfur content of the natural gas consumed. The auxiliary boiler is subject to 40 CFR 60 Subpart Db.

    - Since the auxiliary boiler uses natural gas with a sulfur content not greater than 0.15 grains per 100 cubic feet as its fuel and the operation of the boiler is limited to 876 hours

per year with a maximum of 197.1 million cubic feet of natural gas consumed on an annual basis, compliance will be demonstrated through record keeping on a daily basis of the amount of fuel consumed, the hours of operation and the hourly steam load.

- In Section 6 of R14-0024E the auxiliary boiler is identified as "SX1" and the stack is identified as emission point "EX1." The Title V application shows the auxiliary boiler as "SX-1" and the stack as emission point "EX-1." Therefore in the Title V permit "SX1" and "EX1" have been replaced with "SX-1" and "EX-1" respectively.

- Condition 6.2.1. – "(including the time of start-up and shutdown)" was added to satisfy the requirements in "45CSR§2A-7.1.a.1.

- Condition 6.4.5. was added to the Title V permit which contains the record keeping requirements of 40 CFR §60.49b(r)(1).

Section 7 – Limestone and Ash Handling Systems

- This section contains limits for throughputs, opacity, PM, PM_{10}, emissions and storage pile capacities. The limestone handling equipment is subject to 40 CFR 60 Subpart OOO.

  - With the exception of the limestone truck hopper and the limestone storage pile, all the limestone equipment is fully enclosed. Compliance is demonstrated through periodic visible emission checks and the operation and maintenance of control equipment.

- Condition 7.1.1. – R14-0024E refers to Table 3 for the "Limestone Handling Transfer Limits" which is contained in 7.1.1.b. The table was titled "Table 3 - "Limestone Handling Transfer Limits" in a previous version of the permit and is not titled in this latest version. Therefore the table has been titled "Table 7.1.1 - "Limestone Handling Transfer Limits" in the Title V permit and the references to "Table 3" have been changed to "Table 7.1.1" Also in this permit condition, there were two sub-paragraphs labeled "d." Therefore the second "d" was changed to "e" and the subsequent conditions changed to "f" and "g." This correction is also reflected in condition 7.2.1. in the Title V permit.

- Conditions 7.1.1.c. and d. – [SL-5] has been added after "L-5" since 'SL-5" is the Title V permit ID.

- Condition 7.2.1. – see condition 7.1.1. above.

Section 8 – Internal Combustion Engines

- This section contains limits for hours of operation; sulfur content and amount of the fuels used; and PM, PM_{10}, SO_2, NO_x, CO, NMHC + NO_x, and VOC emissions. The emergency generator and fire pump engines are subject to 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ.

  - To meet the requirements of Subpart ZZZZ, pursuant to 40 CFR §603.6590(c)(1), the engines must meet the requirements of Part 60 Subpart IIII. The engines are EPA certified compliant engines and therefore comply with Subpart IIII. Additionally, monthly records of hours of operation and a 12-month rolling total for each engine are kept.

Appendix A and Appendix B

- R14-0024 contains Appendix A which has a sample form for visible emissions observations. This form has not been included in the Title V permit.

- R14-0024 contains Appendix B which has Tables A and B listing the coal and limestone emission points subject to a visible emission standard. This Appendix has been included in the Title V permit as Appendix B.

5. 45CSR16 - *Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60*

➢ 40 C.F.R 60, Subpart Da - *Standards of Performance for Electric Utility Steam Generating Units*

- The PC Boiler is capable of combusting more than 250 MMBtu/hr heat input of coal and commenced construction after September 18, 1978. Therefore it is subject to Subpart Da.

- This subpart establishes emission limits for PM and opacity, NO_x, and SO_2. It also establishes compliance provisions for such emission limits. These requirements have been included in permit R14-0024E and in the Title V permit in Section 5.

  - CEMS are used to monitor and record the emissions of PM, SO_2, and NO_x.in accordance with 40 CFR Part 60 for PM and 40 CFR Part 75 for SO_2 and NO_x. Reporting requirements are contained in section 5.5. of the Title V permit.

  - Since PM CEMS is installed and operated for measuring PM emissions in accordance with 40 CFR 60 Subpart Da, pursuant to 40 CFR §60.42Da(b)(1), the boiler is exempt from the opacity standard of Subpart Da.
    .
  - The initial testing required by this subpart has been completed and therefore not included in the Title V permit.

➢ 40 C.F.R 60, Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*

- The auxiliary boiler is capable of combusting more than 100 MMBtu/hr heat input of natural gas and commenced construction after June 19, 1984. Therefore it is subject to Subpart Db.

- This subpart establishes emission limits for PM and opacity, NO_x, and SO_2. It also establishes compliance provisions for such emission limits.

  - The auxiliary boiler is fired on gaseous fuel (i.e., natural gas) and therefore pursuant to 40 CFR §60.42b(k)(2) is exempt from the SO_2 emission limits. There are no PM standards for natural gas fired boilers. The auxiliary boiler would be subject to the NO_x emission limit except that it meets the limited use criteria described in §§60.44b(j)(1), (2), and (3). Therefore, pursuant to §60.44b(k) the auxiliary boiler is not subject to the NO_x emission limits.

  - The maximum heat input capacity demonstration required in §60.46b(g) has been completed and therefore not included in the Title V permit.

- 40 CFR 60 Subpart Y – *Standards of Performance for Coal Preparation Plants*

  - The coal handling facility is subject to the requirements of Subpart Y which limits the opacity from any coal processing and conveying equipment and coal storage systems to 20%. The requirements of this subpart have been included in permit R14-0024E and in the Title V permit in Section 4.

    - The initial compliance testing was performed and completed by the facility in accordance with 40 CFR §60.8 and §60.257(a). Ongoing compliance will be demonstrated by periodic visible emission checks.

- 40 CFR 60, Subpart OOO - *Standards of Performance for Nonmetallic Mineral Processing Plants*

  - The Limestone handling facility is subject to the requirements of Subpart OOO which establishes limits for particulate matter emissions and visible emissions from crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins or enclosed truck or railcar loading stations used in nonmetallic mineral processing plants. The requirements of this subpart have been included in permit R14-0024E and in the Title V permit in Section 7.

    - The initial compliance testing was performed and completed by the facility in accordance with 40 CFR §60.8 and §60.675. Ongoing compliance will be demonstrated by periodic visible emission checks.

- 40 CFR 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

  - The emergency generator engine is a 1528 horsepower diesel engine with an engine displacement of 37.1 liters. The fire pump engine is a 240 horsepower diesel engine with a displacement of 6.8 liters. Both engines were manufactured after 2006 and are subject to the requirements of Subpart IIII which establishes emission limits for particulate matter, carbon monoxide and non-methane hydrocarbons plus nitrogen oxides as well as operation and maintenance requirements. These requirements are included in the Title V permit in Section 8.

    - The emergency generator and fire pump engines are EPA certified. The fire pump engine is also a National Fire Protection Association (NFPA) fire pump engine. Therefore they meet the requirements of 40 CFR §60.4211(c) and are in compliance with this subpart and are not subject to 40 CFR §60.4211(g) for compliance testing. They also meet the standards applicable to non-emergency engines and therefore are not required to install non-resettable hour meters pursuant to 40 CFR §60.4209(a).

    - Neither engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR §60.4202 and therefore 40 CFR §60.4209(b) in not applicable.

    - Pursuant to 40 CFR §60.4214(b) Initial notification is not required for emergency stationary internal combustion engines.

6. 45CSR33 – *Acid Rain Provisions and Permits*

- 40 CFR Parts 72, 73, 74, 75, 76, 77 & 78 - *Permits Regulation, Sulfur Dioxide Allowance System Permits Regulation, Sulfur Dioxide Opt-ins, Continuous Emissions Monitoring, Nitrogen Oxides Reduction Program, Excess Emissions, & Appeals Procedure for Acid Rain Program*

  - Longview's PC Boiler "SB-1" is a Phase II Acid Rain affected unit under 45CSR33 as defined by 40 CFR §72.6, and as such must meet the requirements of 40 CFR Parts 72, 73, 74, 75, 76, 77 and 78.

    - Condition 5.5.8. of the Title V permit has requirements for the Acid Rain Program.

7. 45CSR34 - *Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR Part 63*

- 40 CFR 63, Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)*

  - The emergency generator and fire pump diesel engines are defined as new stationary RICE (commenced construction after June 12, 2006) and are subject to the area source (non-major source of HAPs) requirements of Subpart ZZZZ

    - Pursuant to 40 CFR §63.6590(c) since these engines are located at an area source of HAPs and are new stationary RICE, they must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60 subpart IIII, for compression ignition engines. No further requirements apply for these engines under Subpart ZZZZ.

      These engines meet the requirements in 40 CFR 60 Subpart IIII which are included in the Title V permit in Section 8. (See item 5 above)

- 40 CFR Part 63 Subpart UUUUU - *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units (EGU)*

  - The PC Boiler commenced construction prior to May 3, 2011 and is therefore defined as an existing electric utility steam generating unit (EGU). It is subject to the requirements of Subpart UUUUU which establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from coal- and oil-fired EGUs. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Pursuant to 40 CFR §63.9984(b) an existing EGU must comply with this subpart no later than April 16, 2015. Therefore, not all of the requirements have been included in the Title V permit. If required to conduct an initial compliance demonstration by performance testing as specified in §63.10011(a), the permittee must submit a Notification of Compliance Status (NOCS) report according to §63.9(h)(2)(ii). If required to submit an NOCS, a complete application for a modification to the Title V permit to incorporate the specific requirements of Subpart UUUUU must also be submitted. (See condition 5.1.19.)

    Compliance with the mercury, non-mercury HAP metals, and hydrochloric acid requirements in Permit R14-0024E and included in the Title V permit (See conditions 5.1.9., 5.1.10., 5.1.11., and 5.2.1.e.) do not fall under the April 16, 2015 compliance date of Subpart UUUUU.

8. 40 CFR 64 - *Compliance Assurance Monitoring (CAM)*

- Longview's PC Boiler SB-1 is a pollutant specific emissions unit (PSEU) for PM_{10} meeting the applicability requirements of 40 CFR §64.2 and therefore a CAM plan has been submitted with the Title V application. The submitted CAM plan for the fabric filter controlling PM_{10} emissions from the PC Boiler meets the requirements of 40 CFR Part 64. CAM requirements are contained in permit conditions 5.2.1.a., 5.2.9. through 5.1.14. inclusive, 5.4.7., and 5.5.7.

Monitoring per the CAM Plan for the PSEU will be as follows:

		PSEU PC Boiler SB-1
		Indicator No. 1
I.	**Indicator**	PM CEMS
	Monitoring Approach	A continuous emissions monitor system (CEMS) will be used to measure PM emitted from SB-1. The PM CEMS data will be used as a surrogate for PM_{10} data, as PM_{10} is a smaller size fraction of the PM data measured by the CEMS. If the 6-hour rolling average PM data complies with the emissions limit for PM_{10}, then compliance will be demonstrated. (5.2.1.)
II	**Indicator Range**	Measured emissions will be compared to the PM_{10} emissions limit of 110 lb/hr based on a 6-hr rolling average. (5.1.5.)
	A. QIP threshold	Not provided at this time.*
III	**Performance Criteria** **A. Data Representativeness**	The PM CEMS shall be installed and operated in accordance with Performance Specification (PS) 11 in appendix B of 40CFR60. (5.2.1.)
	B. Verification of Operational Status	NA
	C. QA/QC Practices and Criteria	Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 2 in appendix F of 40CFR60. The permittee shall perform Relative Response Audits on an annual basis and a Response Correlation Audit once every three (3) years. (5.2.1.)
	D. Monitoring frequency	The PM CEMS monitors on a continuous basis. (5.2.1.)
	E. Data Collection Procedure	CEMS data is collected and recorded automatically. (5.2.1.)
	F. Averaging Period	6-hr rolling average. (5.1.5.)

*A QIP threshold is not required to be part of the CAM plan and was not included in the CAM plan submittal.

- Oxides of Nitrogen (NO_x), and Sulfur Dioxide (SO_2) are exempt from CAM pursuant to 40 CFR §64.2(b) because the PC Boiler is subject to the limits/standards of 40 CFR60 Subpart Da which was proposed after November 15, 1990.

- The CAM rule is not applicable to Carbon Monoxide (CO) for the PC Boiler since there is no add-on control device utilized to meet its emission limitation.

- The CAM rule is not applicable for Volatile Organic Compounds (VOCs), or Hazardous Air Pollutants (HAPs) for the PC Boiler since these pollutants do not trigger the pre-control major source threshold limits.

- There are no other potential PSEUs that meet the applicability criteria of 40 CFR §64.2(a) which would require CAM.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR5	Pursuant to 45CSR5, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR5. 45CSR2 is applicable to the facility.
45CSR17	Pursuant to 45CSR17, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR17. 45CSR2 is applicable to the facility.
40 C.F.R. 60 Subpart Kb	The facility does not include storage vessels greater than or equal to 75 cubic meters that are used to store volatile organic liquids for which construction, reconstruction or modification commenced after July 23, 1984.
40 CFR 63 Subpart JJJJJJ	The auxiliary boiler is a gas-fired boiler and therefore not subject to this subpart pursuant to §63.11195(e).
Greenhouse Gas (GHG) Permitting	The existing PSD permit was issued prior to the GHG tailoring rule. There have not been any modifications to the facility that would trigger a PSD permit. Therefore, there are no applicable GHG requirements

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	March 12, 2013
Ending Date:	April 11, 2013

All written comments should be addressed to the following individual and office:

Frederick Tipane
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.